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Attorneys for Plaintiffs

CHRISTOPHER WILLIAMS, SAM ALBURY, AND SHAIA BECKWITH SIMMONS,  
INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CHRISTOPHER WILLIAMS, SAM ALBURY,  
and SHAIA BECKWITH SIMMONS, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A. and WELLS  
FARGO & CO.,

Defendant.

CASE NO: 3:22-cv-00990-JD

**PLAINTIFFS' RESPONSE TO  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES  
SHOULD BE RELATED**

Class Action

Jury Trial Demanded

Hon. James Donato

PLAINTIFFS' RESPONSE TO ADMINISTRATIVE MOTION TO CONSIDER WHETHER  
CASES SHOULD BE RELATED, 3:22-cv-00990-JD

1 Pursuant to Local Rules 3-12 and 7-11, Plaintiffs Christopher Williams (“Williams”), Sam  
2 Albury (“Albury”), and Shaia Beckwith Simmons (“Simmons”) (Williams, Albury, and Simmons  
3 collectively, “Plaintiffs”), on behalf of themselves and all others similarly situated, by and through  
4 their attorneys, hereby file Plaintiffs’ Response to Administrative Motion to Consider Whether  
5 Cases Should be Related and state as follows:  
6

7 Plaintiff Christopher Williams filed this lawsuit challenging Wells Fargo’s racially  
8 discriminatory lending practices on a class-wide basis on February 17, 2022; he later amended the  
9 complaint to add additional plaintiffs and allegations. The *Williams* lawsuit was filed only after  
10 considerable investigation, statistical analysis, and discussions with Wells Fargo concerning its  
11 lending practices.  
12

13 Bloomberg News published an investigative news report on March 10, 2022, detailing racial  
14 disparities in Wells Fargo’s lending based on publicly available data. On March 18, 2022, the  
15 *Braxton* lawsuit was filed, quoting heavily from the Bloomberg news report, which appears to be  
16 the sole basis of the *Braxton* lawsuit.

17 The cases are not necessarily related at this juncture. The *Williams* complaint is broader  
18 than the *Braxton* case and, importantly, is first-filed and can proceed expeditiously. As a result, it  
19 is not likely that the cases will result in “an unduly burdensome duplication of labor and expense  
20 or conflicting results” if they proceed before different Judges. Plaintiffs respectfully submit that the  
21 *Braxton* case could be stayed or dismissed without prejudice pending the outcome of class  
22 certification in this case. Putative class counsel in this case have a long history of class litigation of  
23 race discrimination cases (including against Wells Fargo) and obtaining substantial monetary and  
24 programmatic relief.  
25

26 Counsel for Plaintiffs and Wells Fargo in this case have agreed to meet to discuss Plaintiffs’  
27 statistical findings on June 7, 2022 in Philadelphia. Plaintiffs respectfully request that the Court  
28

1 delay making any findings of relatedness until the parties may be heard (after their meeting) at the  
2 June 16, 2022 conference set by this Court or at another date set by this Court. The *Williams*  
3 plaintiffs believe that the best interests of the class are served by allowing them to zealously  
4 represent the class and proceed with this class action.

5  
6 Respectfully submitted,

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individually and on behalf of all others similarly  
situated*